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16 UNITED STATES DISTRICT COURT

17 NORTHERN DISTRICT OF CALIFORNIA

18 SAN FRANCISCO DIVISION

19 IN RE: TFT-LCD (FLAT PANEL)  
20 ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI  
MDL No. 1827

21 This Document Relates To:

**STIPULATION AND [PROPOSED]  
ORDER MODIFYING DEADLINE  
FOR FILING OF MOTIONS TO  
COMPEL**

22 Case No. 09-cv-5609 SI  
23 NOKIA CORPORATION and  
24 NOKIA, INC.,

Plaintiffs,

25 v.

26 AU OPTRONICS CORPORATION, et al.

27 Defendants.

28 Plaintiffs Nokia Corporation and Nokia, Inc. and Defendants (collectively,  
29 "Parties") hereby stipulate as follows:

**STIPULATION**

30 WHEREAS discovery closed in this case on December 8, 2011, as set forth in the  
31 Stipulation and Order Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff  
32 and State Attorney General Actions (Dkt. No. 3110, the "Scheduling Order");

1           WHEREAS the Court has entered an Order extending the close of fact discovery set  
2 forth in the Scheduling Order for the limited purpose of allowing sufficient time for  
3 defendants to take the depositions of Nokia employees Juha Liukkonen and Timo Mustonen  
4 (Dkt. No. 4254);

5           WHEREAS the parties have submitted a Stipulation and Proposed Order to the  
6 Court extending the close of fact discovery set forth in the Scheduling Order for the limited  
7 purpose of extending the deadline for which Nokia and certain other Direct Action  
8 Plaintiffs in Track One have to respond to discovery requests served by defendants between  
9 October 31 and November 4, 2011 and to update Exhibit A (chart of conspiracy evidence)  
10 to previously served discovery responses (Dkt. 4313);

11           WHEREAS Nokia and defendants are currently meeting and conferring concerning  
12 various issues related to: (1) Nokia's responses to defendants' written discovery served as  
13 of December 8, 2011; (2) Nokia's production of documents as of December 8, 2011; (3) the  
14 deposition testimony of Nokia's employees and Nokia pursuant to Fed. R. Civ. P. 30(b)(6)  
15 as of December 8, 2011 (collectively, "Nokia's Discovery Responses"); and (4) defendants'  
16 discovery responses, production of documents and sufficiency of deposition testimony  
17 pursuant to Fed. R. Civ. P. 30(b)(6) (collectively, "Defendants' Discovery Responses");

18           WHEREAS Nokia and defendants hope to resolve some or all of these issues  
19 informally, without the need to file motions to compel and seek the Court's involvement;

20           WHEREAS the current deadline for parties to file motions to compel with respect to  
21 Nokia's Discovery Responses or Defendants' Discovery Responses is December 15, 2011;  
22 and

23           WHEREAS in an effort to facilitate the informal resolution of any disputes, the  
24 parties wish to extend the deadline for Nokia or defendants to file any motions to compel  
25 with respect to Nokia's Discovery Responses or Defendants' Discovery Responses through  
26 January 13, 2012.

27           NOW, THEREFORE, the Parties, through their undersigned respective counsel,  
28 stipulate and agree as follows:

1 The deadline for Nokia or defendants to file any motion to compel with respect to  
2 Nokia's Discovery Responses or Defendants' Discovery Responses is extended through and  
3 including January 13, 2012.

4 Dated: December 12, 2011.

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## IT IS SO ORDERED.

Dated Entered: 12/16/11

Susan Merton

27 **ATTESTATION:** Pursuant to N.D. Cal. General Order 45, Part X-B, the filer attests that  
28 concurrence in the filing of this document has been obtained from each signatory hereto.